

WILMER CUTLER PICKERING  
HALE AND DORR LLP

SONAL N. MEHTA (SBN 222086)  
Sonal.Mehta@wilmerhale.com  
2600 El Camino Real, Suite 400  
Palo Alto, California 94306  
Telephone: (650) 858-6000

DAVID Z. GRINGER (*pro hac vice*)  
David.Gringer@wilmerhale.com

ROSS E. FIRSENBAUM (*pro hac vice*)  
Ross.Firsenbaum@wilmerhale.com

RYAN CHABOT (*pro hac vice*)  
Ryan.Chabot@wilmerhale.com

PAUL VANDERSLICE (*pro hac vice*)  
Paul.Vanderslice@wilmerhale.com

7 World Trade Center  
250 Greenwich Street  
New York, New York 10007  
Telephone: (212) 230-8800

*Attorneys for Defendant Meta Platforms, Inc.*

ARI HOLTZBLATT (*pro hac vice*)  
Ari.Holtzblatt@wilmerhale.com

MOLLY M. JENNINGS (*pro hac vice*)  
Molly.Jennings@wilmerhale.com  
2100 Pennsylvania Ave NW  
Washington, DC 20037  
Telephone: (202) 663-6000

MICHAELA P. SEWALL (*pro hac vice*)  
Michaela.Sewall@wilmerhale.com  
60 State Street  
Boston, Massachusetts 02109  
Telephone: (617) 526-6000

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z. GRINGER  
IN SUPPORT OF DEFENDANT META  
PLATFORMS, INC.'S MOTION TO  
EXCLUDE EXPERT TESTIMONY AND  
OPINIONS OF KEVIN KREITZMAN**

Judge: Hon. James Donato

1 I, DAVID Z. GRINGER, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I  
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this  
4 declaration in support of Meta's Motion to Exclude Expert Testimony and Opinions of Kevin  
5 Kreitzman.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Merits  
7 Report of Kevin Kreitzman, dated January 12, 2024.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the transcript  
9 from Kevin Kreitzman's merits deposition, held on March 6, 2024.

10 4. Attached hereto as Exhibit 3 is a true and correct copy of the Expert Merits  
11 Report of Michael A. Williams, dated January 12, 2024.

12 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the transcript  
13 from Michael A. Williams' merits deposition, held on February 23, 2024.

14 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the transcript  
15 from Kevin Kreitzman's class certification deposition, held on October 2, 2023.

16 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the transcript  
17 from Michael A. Williams' class certification deposition, held on September 26, 2023.

18 8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the transcript  
19 from Scott Fasser's class certification deposition, held on September 7, 2023.

20 9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of the transcript  
21 from Joshua Gans' class certification deposition, held on September 26, 2023.

22 10. Attached hereto as Exhibit 9 is a true and correct copy of the Expert Reply Report  
23 of Kevin Kreitzman, dated September 15, 2023.

24 11. Attached hereto as Exhibit 10 is a true and correct copy of the Expert Merits  
25 Rebuttal Report of Kevin Kreitzman, dated February 9, 2024.

26 12. Attached hereto as Exhibit 11 is a true and correct copy of an excerpt from the  
27 consolidated financial statements of Wirtualna Polska Capital Group for the year ending  
28 December 31, 2022.



**SIGNATURE ATTESTATION**

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

By: /s/ Sonal N. Mehta  
Sonal N. Mehta